

EXHIBIT C

Shelly Bloor

From: Will Cochran
Sent: Wednesday, February 26, 2020 5:01 PM
To: Chris Williams
Subject: FW: Turnage v. Oldham, Case No. 2:16-cv-02907
Attachments: Notice to Take the Deposition of Ed Raper (file stamped).pdf

From: Will Routt <wroutt@watsonburns.com>
Sent: Wednesday, November 13, 2019 5:27 PM
To: Craddock, Bob <rcraddock@wyattfirm.com>; Horton, Odell <ohorton@wyattfirm.com>; Brown, Byron <bbrown@wyattfirm.com>; Cox, Meghan <mcox@wyattfirm.com>; lee.whitwell@shelbycountyttn.gov
Cc: Frank Watson <fwatson@watsonburns.com>; Bill Burns <bburns@watsonburns.com>; MMclaren <MMclaren@blackmclaw.com>; Will Cochran <wcochran@blackmclaw.com>; Brice Timmons <btimmons@blackmclaw.com>; Charles Mitchell <cmitchell@blackmclaw.com>; Trammell, Brad <btrammell@bakerdonelson.com>; beth.petronio@klgates.com; dhalijan@bpjlaw.com; wirvine@bpjlaw.com; bbundren@babco.com; jmurphy@bradley.com; amclean@spicerfirm.com; kdb@spicerfirm.com; hgwinna@grsm.com; tony.swafford@arlaw.com; ben.fox@arlaw.com
Subject: Turnage v. Oldham, Case No. 2:16-cv-02907

All-

Plaintiffs' Notice to Take the Deposition of Ed Raper on December 18, 2019 is attached. If December 18 does not work, Plaintiffs are also available on December 9 and December 20. Happy to discuss.

Thanks,

Will

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN,
DEONTAE TATE, JEREMY S. MELTON,
ISSACCA POWELL, KEITH BURGESS,
TRAVIS BOYD, TERRENCE DRAIN, and
KIMBERLY ALLEN on behalf of themselves and
all similarly situated persons,

Plaintiffs,

v.

BILL OLDHAM; FLOYD BONNER, JR.;
ROBERT MOORE; KIRK FIELDS; CHARLENE
MCGHEE; REGINALD HUBBARD; DEBRA
HAMMONS; TIFFANY WARD; SHELBY
COUNTY, TENNESSEE; TYLER
TECHNOLOGIES, INC.; GLOBAL TEL*LINK
CORPORATION; SOFTWARE AG USA, INC.;
SIERRA-CEDAR, INC.; SIERRA SYSTEMS
GROUP, INC.; and TETRUS CORP.,

Defendants.

Civil Action No. 2:16-cv-02907-SHM-
tmp

(Hon. Judge Samuel H. Mays)

NOTICE TO TAKE THE DEPOSITION OF ED RAPER

To: Ed Raper
c/o Robert E. Craddock, Esq.
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-and-

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Please take notice that pursuant to Rule 30(a)(1) of the Federal Rules of Civil Procedure, Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen will take the deposition of Ed Raper at the law offices of BLACK McLAREN JONES RYLAND & GRIFFEE, P.C., 530 Oak Court Drive, Suite 360, Memphis Tennessee 38117, commencing on **December 18, 2019 at 9:30 a.m.**, Central Standard Time, and continuing thereafter from hour to hour and day to day until complete.

The deposition will be taken on behalf of Plaintiffs for the purposes of discovery, use as evidence, preservation of testimony, and all other purposes authorized by law and will be recorded by a certified court reporter, who will record the deposition by means of stenograph and/or audio recordings. The deposition may also be recorded by video or other visual and electronic means.

Respectfully submitted,

s/ William E. Routt

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Members*

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November, 2019, a true and correct copy of the foregoing pleading has been filed electronically with the Court's Electronic Case Filing System. Pursuant to the Court's ECF System, the following parties listed below are filing users who will receive notice of the foregoing document's filing:

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